

Ira Spiro (Bar No. 67641)
10573 West Pico Blvd. #865
Los Angeles, California 90064
Telephone: 310-235-2350
e-mail: ira@spirolawcorp.com
Defendant, a Self-Represented Attorney

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

TODD R.G. HILL,

Plaintiff,

vs.

THE BOARD OF DIRECTORS,
OFFICERS AND AGENTS AND
INDIVIDUALS OF THE PEOPLES
COLLEGE OF LAW ET AL.,

Defendants.

Case No. CV23-1298-CV(BFM)

**CASE MANAGEMENT
STATEMENT**

Before
**Hon. Cynthia Valenzuela and
Hon. Magistrate Judge
Brianna Fuller Mircheff**

This CORRECTED Case Management Statement is the same as the one this Defendant filed on 2/8/25 (ECF 208) except:

1. It is shortened to 10 pages to comply with the Court's order (ECF 205).
2. An answer to item k of the order is added.
3. Insertion of a few abbreviations and ellipses for full quotations to shorten the statement.
4. The list of defendants was converted to a table, to shorten the Statement.
5. Revision of answer to item j to add citation to *Meggs v NBC Universal* (CD Cal 2017), which holds (p. 4) that meeting and conferring per Local Rule 7-3 can be done by email.

1 Pursuant to paragraph 12 of the Court’s order of February 6, 2025 (ECF 205),
2 given that Plaintiff is proceeding without counsel, Defendant Ira Spiro (sued as
3 Robert Ira Spiro) submits the following Separate Case Management Statement.

4 Presently the most important information about this case is in the Report and
5 Recommendation of Magistrate Judge Mircheff regarding disposition of the various
6 Defendants’ motions to dismiss the Second Amended Complaint pursuant to Federal
7 Rule of Civil Procedure 8, on the grounds that a host of pleading errors result in its
8 failure to state a claim. The Report reads:

9 “These errors [in the Second Amended Complaint] and others like them
10 prevent any given Defendant from understanding exactly what Plaintiff
11 alleges that Defendant did wrong. And ... the SAC does not do what the
12 District Judge instructed Plaintiff to do: “‘intelligently inform’ Defendants in
13 this action—and this Court—who violated his rights, what facts show that his
14 rights were violated, when the violations occurred, where they happened, and
15 why he is entitled to relief.” (See ECF 45 at 10.) ... **this Court is lost in a sea
16 of events, meetings, and emails, without a clear understanding of how
17 any of the allegations support Plaintiff’s claims.”**

18 “The Court therefore believes that it would be appropriate to give
19 Plaintiff **one last opportunity** to attempt to state a claim.”

20 (ECF 132, p. 14, lns. 12-21 and p.2, lns. 10-12, emph. added. This report was
21 adopted by District Judge Staton (ECF 145).)

22 Despite Judge Mircheff’s criticism of errors in the Second Amended
23 Complaint, **plaintiff filed at Third Amended Complaint (ECF 148) with
24 precisely the same types of errors.** Motions to dismiss the Third Amended
25 Complaint are pending.

26 In addition, Defendant Spiro answers the specific items in the Reassignment
27 Order of Judge Valenzuela (ECF 205) as follows:

28 **a. The date the case was filed:** February 20, 2023

b. A list identifying or describing each party: Plaintiff Hill and Defendants:

Board of Directors ... Peoples College of Law	Joshua Gillens	Adriana Zuniga Nunez	Brandon N. Stallings	Paul A. Kramer
The Guild Law School etc.	Clemente Franco,	Roger Aramayo	Ruben Duran	Jean Krasilnikoff
Hector C. Peña	Hector Sanchez	William Maestas	Hailyn Chen	Ellin Davtyan
Christiana Marin Gonzalez	Pascual Torres	Ismael Venegas	Audrey Ching	George S. Cardona
Robert Ira Spiro [Ira Spiro]	Carol Deupree [deceased]	Louisa Ayrapetyan	Melanie M. Shelby	Devan Mcfarland
Juan Manuel Sarinana	Gary Silbiger	Natalie Leonard	Arnold Sowell, Jr.	Enrique Zuniga
David Tyler Bouffard	Edith Pomposo	Leah Wilson	Mark W. Toney	Paul A. Kramer

c. A brief summary of all claims, counterclaims, crossclaims, or third party claims

There are no counterclaims, crossclaims, or third party claims. A brief summary of all claims in the most recent amended complaint, the Third Amended Complaint, cannot be done, for the reasons stated in the Report and Recommendation of Magistrate Judge Mircheff, which describes the Second Amended Complaint but is equally true of the Third Amended Complaint:

“[it] does not ... “‘intelligently inform’ Defendants ... and this Court—who violated his rights, what facts show that his rights were violated, when the violations occurred, where they happened, and why he is entitled to relief.”

1 (ECF 132, p. 14, lns. 15-18).

2 However, the first two pages of the Third Amended Complaint list the
3 following purported causes of action:

4 I. Equal Protection Violation Under The 14th Amendment

5 II. Violation Of The Unruh Civil Rights Act (Cal. Civil Code § 51)

6 III. Title VI of The Civil Rights Act of 1964 - Racial Discrimination In
7 Education

8 IV. RICO - Damages ...

9 V. Conspiracy

10 VI. Negligence And Negligence Per Se

11 VII. Negligent Hiring, Retention, And Supervision

12 VIII. Violation of Title IX Education Amendments of 1972 (20 U.S.C. §
13 1681)

14 **d. A brief description of the events underlying the action.**

15 This cannot be done either, for reasons stated in Report and Recommendation
16 of Magistrate Judge Mircheff quoted below in this paragraph. It describes the
17 Second Amended Complaint but is equally true of the Third Amended Complaint.
18 The Third Amended Complaint is 188 pages long including exhibits, which are
19 referred many times in it and to some extent expressly incorporated in it. Judge
20 Mircheff wrote: “this Court is lost in a sea of events, meetings, and emails, without a
21 clear understanding of how any of the allegations support Plaintiff’s claims. this
22 Court is lost in a sea of events, meetings, and emails, without a clear understanding
23 of how any of the allegations support Plaintiff’s claims. And each cause of action
24 contains lists of facts, many of which have no relation to the cause of action under
25 which they fall—making it impossible for the Court to test their legal sufficiency”
26 (ECF 132, p. 14, lns. 19-23.)

27

28

e. A description of the relief sought and the damages claimed with an explanation of how damages have been (or will be) computed

A section of the Third Amended Complaint entitled “REMEDIES” probably functions as a prayer, although it is several pages long. This Defendant believes it is impossible to know how the damages have been or could be computed. This “REMEDIES” section reads:

“REMEDIES

“260. Plaintiff re-alleges and incorporates by reference all prior allegations contained in ¶¶ 1-182, insofar as they establish the Defendants' liability and the Plaintiff's entitlement to the remedies sought herein.

261. Claims for damages against the State Bar and its employees in their official capacities are not pursued where Eleventh Amendment immunity applies.

However, Plaintiff seeks injunctive relief against the State Bar employees in their individual capacities for actions taken outside the scope of their official duties under the Ex Parte Young exception, as it seeks prospective relief to remedy ongoing violations of federal law.

262. Todd did not receive an accurate transcript or degree and is owed money.

A. Monetary Relief:

263. Compensatory damages in an amount to be proven at trial against all Defendants, jointly and severally, for the harm caused by their conduct as described in the First through Eighth Causes of Action.

264. Treble damages, totaling \$750,000.00, as allowed by Civil Code section 52(a) against all Defendants, jointly and severally, for the harm caused by their conduct as described in the Seventh Cause of Action.

265. Punitive damages against all Defendants, jointly and severally, to punish them for their malicious and willful misconduct and to deter similar conduct in the future.

1 266. Plaintiff further seeks punitive damages against the individual defendants for
2 their deliberate indifference to his rights under Title IX.

3 B. Declaratory Relief:

4 267. A declaration that the State Bar's "non-interference" policy is unlawful and
5 violates the rights of students at unaccredited law schools.

6 268. A declaration that PCL's practices, as described in this Complaint, violate
7 the Unruh Civil Rights Act and the California Business and Professions Code.

8 269. A declaration that the State Bar failed to adequately supervise PCL's
9 compliance with requirements and that their inaction and failure to intervene after
10 becoming aware of the retaliatory conduct constituted violations of Plaintiff's
11 rights based upon the findings.

12 C. Injunctive Relief:

13 270. The Plaintiff respectfully requests that the Court order the Defendants to
14 issue a public statement acknowledging their wrongdoing and offering a sincere
15 apology to the Plaintiff and all other students who have been adversely affected
16 by their actions and inactions. Such a statement should explicitly recognize the
17 harm caused by the Defendants' conduct and express a commitment to rectifying
18 the systemic issues that allowed such harm to occur.

19 271. The Plaintiff further requests that the Court order the Defendants to establish
20 a restitution fund to compensate all students who have suffered financial or other
21 losses as a result of the Defendants' conduct. The fund should be administered by
22 an independent third party and provide adequate compensation for tuition, fees,
23 lost wages, and other damages incurred by the affected students.

24 272. The Plaintiff urges the Court to mandate that the State Bar implement
25 comprehensive reforms to its accreditation and oversight processes to prevent
26 similar abuses from occurring in the future. These reforms should include, but not
27 be limited to, stricter standards for unaccredited law schools, increased
28

1 transparency and accountability in the accreditation process, and enhanced
2 enforcement mechanisms to address noncompliance.

3 273. The Plaintiff requests that the Court order the State Bar to implement
4 transparency and accountability measures to ensure public trust and confidence in
5 its regulatory functions. These measures should include regular audits of its
6 operations, public reporting of its regulatory activities, and the establishment of
7 an independent
8 ombudsman to address complaints and concerns from the public.

9 274. Plaintiff also seeks injunctive relief requiring PCL and the State Bar to
10 implement policies and training to prevent future violations of Title IV and/or
11 Title IX, including proper handling of complaints and retaliation.

12 275. A permanent injunction ordering the State Bar of California to:

- 13 i. Cease enforcing the "non-interference" policy.
14 ii. Implement and enforce regulations to ensure accurate record-keeping at law
15 schools.
16 iii. Take affirmative steps to address the disparity in bar passage rates between
17 accredited and unaccredited law schools.

18 276. A permanent injunction ordering PCL to: i. Cease all operations and dissolve
19 as a corporation under Corporations Code section § 6518.

- 20 ii. Refund all tuition and fees paid by Plaintiff and other similarly situated
21 students.

22 D. Other Relief:

- 23 i. An order directing PCL to provide Plaintiff with an accurate, complete, and
24 official transcript reflecting all coursework and grades earned, and to confer upon
25 Plaintiff a Juris Doctorate degree.
26 ii. An order directing the State Bar to investigate and take disciplinary action
27 against Defendants Leonard, Wilson, Chen, and Ching for their misconduct.

28 E. Plaintiff also seeks the following remedies:

- i. Civil penalties under Business and Professions Code sections §§ 17206, 17206.1, and 17536 for violating the Business and Professions Code.
- ii. The permanent removal of Defendants under Corporations Code section § 5223 as the Court deems appropriate.
- iii. A declaration of Plaintiff's "good faith" indemnification.
- iv. Plaintiff's costs of suit and other costs under Government Code § 12598.
- v. A statement of determination of PCL's Board Election Validity under California Corporations Code section § 5716.

f. The status of discovery, including any significant discovery management issues, as well the applicable cutoff dates

There has been no discovery, because the most recent amended complaint has not been answered (i.e. the case is not at issue) and there has been no order for a scheduling conference under F.R.C.P. Rules 16 and 26.

g. A procedural history of the case, including any previous motions that were decided or submitted, any ADR proceedings or settlement conferences that have been scheduled or concluded, and any appellate proceedings that are pending or concluded

On February 20, 2023, Plaintiff Todd R.G. Hill filed his initial Complaint. On April 5, 2023, the Court issued an order, on its own motion, dismissing the Complaint for violation of F.R.C.P. 8(a) and (d), with leave to amend.

On April 18, 2023, Plaintiff filed a First Amended Complaint (ECF 38).

On May 5, 2023, Plaintiff filed a document titled "A Motion for Leave to Supplement Todd R. G. Hill's First Amended Complaint" (ECF 40), attaching a proposed "Supplemental First Amended Complaint" (ECF 40-1).

On June 7, 2023, the Court issued an order (ECF 45) that denied Plaintiff's motion to file a "Supplemental First Amended Complaint" and dismissed the First Amended Complaint with leave to amend. The Court's reasons for dismissal are

1 essentially the same as those in the April 5, 2023 order dismissing the initial
2 Complaint.

3 By July 27, 2023, Plaintiff did not file a Second Amended Complaint within
4 the 21 days the Court allotted, or at all. Thus, on July 27, 2023, the Court issued a
5 Judgment of Dismissal (ECF 47) for failure to file a Second Amended complaint
6 within the 21 days.

7 Then, 92 days after the June 7 order giving Plaintiff 21 days to file a Second
8 Amended Complaint, Plaintiff did the following:

9 1. On September 7, 2023, Plaintiff filed a “Motion for Leave to File a
10 Third Amended Complaint and to Set Aside Judgment of Dismissal.” (ECF 48)

11 2. On the same day, September 7, 2023, Plaintiff filed a Second Amended
12 Complaint, even though Plaintiff’s Motion for Leave to File a Second Amended
13 complaint had not been granted or even ruled on, and the Judgment of Dismissal had
14 not been set aside.

15 On September 18, 2023, the Court issued an order (ECF 51) striking the
16 Second Amended complaint.

17 Later on September 18, 2023, the Court issued an order (ECF 54) granting
18 Plaintiff’s motion to set aside the dismissal and ordering Plaintiff to file any
19 amended complaint within 14 days of the order.

20 Two days later, on September 20, 2023, Plaintiff filed the same Second
21 Amended Complaint (ECF 148) he had improperly filed on September 7.

22 On September 28, 2023, Defendant Spiro filed his motion to dismiss the
23 second amended complaint and the entire action.

24 On October 16, 2023, the Court issued a minute order assigning this case to
25 Magistrate Judge Mircheff.

26 On April 23, 2024, the Interim Report and Recommendation of Magistrate
27 Judge Mircheff was filed (ECF 132), analyzing the issues on the motion to dismiss
28 the Second Amended Complaint and recommending a disposition.

1 On August 5, 2024, the Court issued an order (ECF 145), adopting the
2 Magistrate Judge's Report and Recommendations, granting Defendant Spiro's
3 request to dismiss the Second Amended Complaint, with leave to file a "Third
4 Amended Complaint remedying the deficiencies detailed herein." (Emph. added.)

5 Plaintiff filed a Third Amended Complaint. It was served on Defendants by
6 the Court's Notice of Electronic Filing (NEF) on August 26, 2024, although it bears
7 a file stamp of August 21, 2024.

8 All Defendants filed motions to dismiss the Third Amended Complaint.
9 Those motions have been fully briefed since late December, 2024. The Court has
10 not yet ruled on them, tentatively or finally.

11 **h. A description of any other deadlines in place before reassignment**

12 There were no deadlines in place immediately before reassignment.

13 **i. Whether the parties will consent to a magistrate judge for trial**

14 At this point Defendant Spiro does not consent to a magistrate judge for trial,
15 and he does not know whether Plaintiff or the other Defendants will consent.

16 **j. A statement from each parties' counsel indicating they have**

17 **(1) discussed the magistrate judge consent program with their**
18 **respective client(s), and**

19 **(2) met and conferred to discuss the consent program and selection**
20 **of a magistrate judge and**

21 Defendant Spiro is an attorney, representing himself. He has met and conferred
22 with Plaintiff about the program by email (per *Meggs v NBC Universal* (CD Cal 2017)
23 Case No.2:17-cv-03769), stating that he does not presently consent to the program.

24 **k. Whether there is an immediate need for a scheduling conference and,**
25 **if so why the parties believe such a need exists.**

26 There is no immediate need for a scheduling conference.

27 Dated: February 12, 2025

/s/

Ira Spiro

28 Defendant, a Self-Represented Attorney

PROOF OF SERVICE
STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I reside in the State of California, County of Los Angeles. I am over the age of 18 and not a party to this lawsuit. My business address is 10573 West Pico Blvd. #865, Los Angeles, CA 90064.

On the date set forth below, I served the document described as CORRECTED CASE MANAGEMENT STATEMENT on the interested parties in this action by placing: ☐ the original ☒ true copies thereof enclosed in sealed envelopes, addressed as follows to interested parties as follows (or as stated on the attached service list):

Todd R. G. Hill
41459 Almond Avenue
Quartz Hill, Ca 93551

☐ **BY MAIL:** I deposited the envelope(s), with postage prepaid, in the United States Mail (United States Postal Service) at Los Angeles, California.

☒ **BY MAIL PER BUSINESS PRACTICES:** I placed the document(s) in a sealed envelope for collection and mailing following ordinary business practices. I am readily familiar with this business' practice for collection and processing of correspondence for mailing with the U.S. Postal Service, Under that practice, the envelopes are deposited with the U.S. Postal Service that same day in the ordinary course of business with postage thereon fully prepaid at Los Angeles, California.

☐ **BY ELECTRONIC TRANSMISSION:** On the date set forth below I caused to be transmitted the document(s) listed above on the parties listed herein at their most recent known e-mail address(s) or e-mail of record in this action before 6:00 p.m. I hereby certify that this document was served from Los Angeles, California.

☐ **BY PERSONAL SERVICE:** I delivered the document, enclosed in a sealed envelope, by hand to the offices of the addressee(s) named herein.

☐ **BY OVERNIGHT DELIVERY:** I am "readily familiar" with this firm's practice of collection and processing correspondence for overnight delivery. Under that practice, overnight packages are enclosed in a sealed envelope with a packing slip attached thereto fully prepaid. The packages are picked up by the carrier at our offices or delivered by our office to a designated collection site.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed February 12, 2025 at Los Angeles, California.

Ira Spiro

Type or Print Name

/s/

Signature